

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION**

STATE OF MISSOURI, STATE OF  
LOUISIANA, *et al.*,

*Plaintiffs,*

v.

JOSEPH R. BIDEN, JR., in his official  
capacity as President of the United States,  
*et al.*,

*Defendants.*

Case No. 3:22-cv-01213-TAD

**THIRD SUPPLEMENTAL DECLARATION OF JIM HOFT**

1. My name is Jim Hoft. I am over the age of 18 years and competent to testify to the matters expressed herein.

2. I have previously submitted three Declarations in this case, filed with the Court as Doc. 10-5 (45-5), Doc. 227-8, and Doc. 274-4. Those prior Declarations are incorporated by reference herein.

3. My previous three Declarations detailed some examples of injuries I have experienced due to censorship of speech, including my own speech, the speech of others with which I would otherwise have been able to engage but was not due to censorship, and the speech of others published on my website.

4. As described in my previous Declarations, my online publication, The Gateway Pundit, is a news and opinion blog seen by readers millions of times every day. The Gateway Pundit is my sole source of income. Social media platforms can be a very important means of gaining exposure to Gateway Pundit articles and engaging in public debate. However, Gateway

Pundit has been the victim of a federal-private organized and targeted censorship campaign that has lasted several years, and this campaign has regularly interfered with and interrupted my ability to communicate with my readers.

5. The harms I experience due to censorship of speech on social media are ongoing.

6. The Gateway Pundit has built a massive community of engaged readers and a highly trafficked website due to the trust we have built with our readers from the US and abroad.

7. Our success has not gone unnoticed by the US Government, DC elites, legacy media competition and the nation's ruling class.

8. After the 2016 election and Donald Trump's remarkable victory—in early January 2017—we started to see our articles censored, our website targeted, our reach restricted and our income throttled.

9. In March of 2017, Columbia Journalism Review Study (<https://www.cjr.org/analysis/breitbart-media-trump-harvard-study.php>) found The Gateway Pundit was the fourth most tweeted conservative website in 2016.

<b>@realDonaldTrump retweeters</b>	<b>@HillaryClinton retweeters</b>
Breitbart	Washington Post
The Hill	Huffington Post
Fox News	New York Times
Gateway Pundit	The Hill
Politico	CNN
Washington Examiner	Politico
Daily Caller	Politicus USA
CNN	Daily Kos
Washington Post	Raw Story
New York Times	hillaryclinton.com
donaldjtrump.com	MSNBC
Conservative Treehouse	Salon
Infowars	Think Progress
Daily Mail	Daily Newsbin
Truthfeed	Mother Jones
New York Post	Talking Points Memo
Investors	Daily Beast
The Right Scoop	Media Matters
statespoll.com	NBC News
Conservative Tribune	Vox

The most frequently shared media sources for Twitter users that retweeted either Trump or Clinton.

10. In August of 2017, Harvard University's Berkman Klein Center listed The Gateway Pundit as the fourth most influential conservative news outlet on social media during the 2016 election (<https://cyber.harvard.edu/publications/2017/08/mediacloud>).

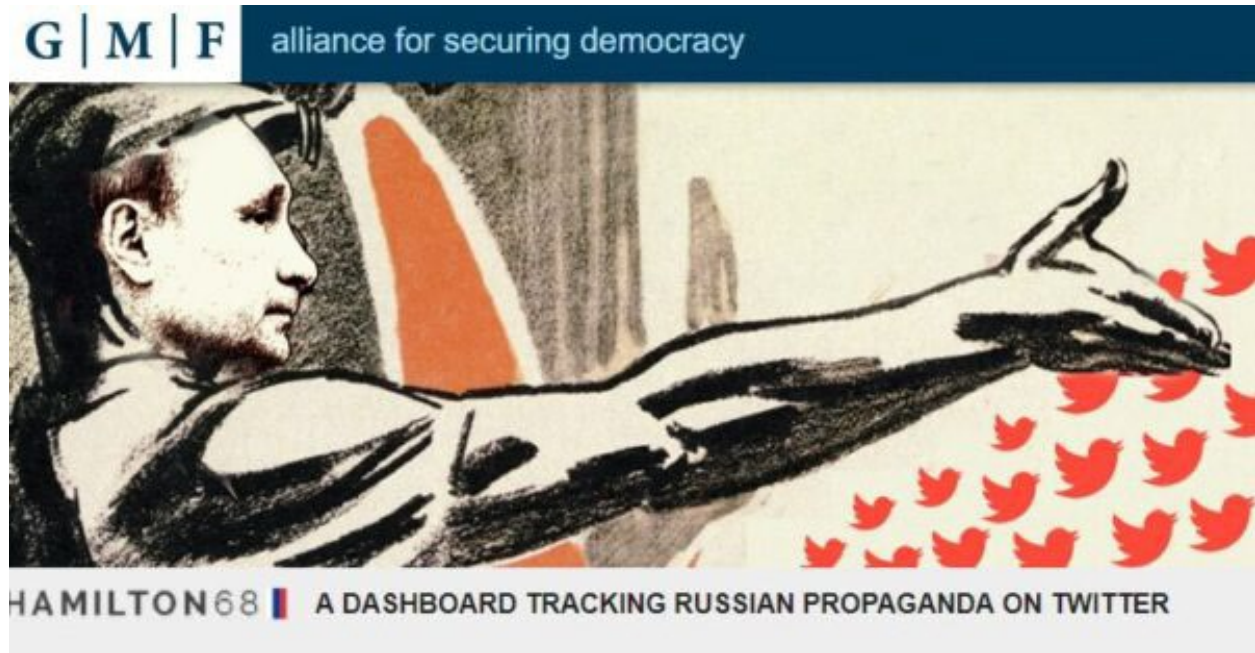
	Inlinks	Twitter	Facebook
1	Breitbart	Breitbart	Breitbart
2	Fox News	Fox News	Conservative Tribune
3	donaldjtrump.com	Washington Examiner	Gateway Pundit
4	NY Post	Daily Caller	Fox News
5	Washington Times	Gateway Pundit	Daily Caller
6	Daily Caller	Right Scoop	Truthfeed
7	Daily Mail	Daily Mail	Western Journalism
8	Washington Examiner	Infowars	Political Insider
9	Wikileaks	NY Post	EndingtheFed
10	Free Beacon	Washington Times	NY Post

*Table 1: Most popular media on the right from May 1, 2015, to November 7, 2016*

11. The censorship and attacks began in the weeks and months before these reports were published.

12. For example, in 2017 The Gateway Pundit immediately lost all advertising from Amazon. The ad company labeled The Gateway Pundit “undesirable” in an effort to remove its ads from our website—a substantial hit on our income.

13. In August of 2017, The Gateway Pundit was also targeted by a group called Hamilton 68. The group of powerful DC elites and prominent intel leaders claimed to track Russian propaganda. The group immediately listed The Gateway Pundit as one of the top Russian propaganda websites (see <https://www.thegatewaypundit.com/2017/08/liesleft-wing-smear-machine-lists-gateway-pundit-top-russia-propaganda-website/>), despite no proof of this whatsoever, in order to smear and damage our website.



The Gateway Pundit is one of top sites listed.

Top Domains	
Domain	Times mentioned in the last 48 hours
truepundit.com	166
zerohedge.com	97
pscp.tv	59
thegatewaypundit.com	56
foxnews.com	54
breitbart.com	53
sptnkne.ws	43

14. Before the 2020 election, the Department of Homeland Security created the Stanford Election Integrity Partnership (EIP) Censorship Group, The Gateway Pundit was the most targeted website by this US government-created censorship group. *See*, <https://www.thegatewaypundit.com/2023/11/new-emails-show-dhs-created-stanford-university-eip/>. The Gateway Pundit topped the list of posts flagged by EIP (*see* <https://www.thegatewaypundit.com/2023/11/new-emails-show-dhs-created-stanford-university-eip/>), impressively nearly doubling its closest competitor, with a 46 “incidents” on election integrity, next to 26 incidents by our friends at Breitbart.com. *See* <https://justthenews.com/accountability/watchdogs/news-organizations-targeted-fascist-public-private-partnership-stamp-out>.



Rank	Domain	Incidents	# Original Tweets	Total Retweets	≈% Left Spread	≈% Right Spread
1	www.thegatewaypundit.com	46	29,207	840,740	0.08%	99.92%
2	www.breitbart.com	26	8,569	394,689	0.94%	99.06%
3	www.youtube.com	21	14,040	269,996	2.51%	97.49%
4	www.washingtonpost.com	18	1,986	74,360	84.76%	15.23%
5	www.foxnews.com	14	1,330	34,143	0.91%	99.09%
6	www.theepochtimes.com	12	2,167	86,325	0.00%	100.00%
7	nypost.com	11	4,513	178,176	2.27%	97.73%
8	www.zerohedge.com	10	1,043	27,687	0.52%	99.48%
8	www.cnn.com	10	1,269	100,642	89.28%	10.71%
10	apnews.com	9	432	13,067	33.84%	66.14%
10	justthenews.com	9	1,035	61,305	0.00%	100.00%
10	www.nytimes.com	9	776	50,021	63.88%	36.11%
10	thedcpatriot.com	9	572	26,417	0.00%	99.99%
14	gellerreport.com	8	516	15,075	0.00%	99.99%
14	thenationalpulse.com	8	770	39,160	0.00%	99.99%
14	nationalfile.com	8	4,443	195,489	0.51%	99.48%
17	www.washingtontimes.com	7	280	11,445	1.45%	98.54%
17	www.pscp.tv	7	2,067	83,269	0.47%	99.53%
17	saraacarter.com	7	531	81,172	1.39%	98.60%
17	www.washingtonexam- iner.com	7	1,518	75,939	0.98%	99.02%

Table 5.3: Domains, extracted from tweets, that were highly tweeted (>500) across multiple incidents. Shortened URLs were followed when possible to extract original domains. The incident count includes the number of incidents for which the domain was linked to in over 500 tweets or retweets in our incident-related Twitter data. The original tweets are the count of non-retweets (including quote tweets and replies) that mentioned the domain within those incidents, while the total retweets column is a count of the retweets, both from within our incident-linked Twitter data. Finally, the estimated right/left spread is the proportion of original tweets made by influential users classified on the ideological spectrum based on our network analysis, above. Users not included in that network analysis are excluded from the estimate.

See <https://stacks.stanford.edu/file/druid:tr171zs0069/EIP-Final-Report.pdf>

15. In February of 2021, Twitter shut down my/Gateway Pundit’s Twitter account, after we posted videos of vans secretly driving into Detroit’s TCF Center and dropping an estimated 60,000 ballots at 3:30 am on the morning after Election Day, 2020. See <https://www.businessinsider.com/twitter-suspends-gateway-pundit-jim-hoft-2021-2>. This was a crucial bit of reporting because the government and mainstream media viciously attacked and “debunked” statements by witnesses, and tried to convince the public that this late-night ballot

dump never occurred and was a right-wing conspiracy theory. The video proved otherwise, and Twitter banned us in coordination with federal censors.

16. In March of 2021, The Long Fuse Report (*see* <https://www.eipartnership.net/report>) released by government-funded EIP devoted an entire section to The Gateway Pundit. *See* <https://www.thegatewaypundit.com/2022/12/expected-gateway-pundit-top-target-twitter-govt-alliance-public-report-even-devoted-entire-section-gateway-pundit/>.

17. In September of 2021, Google completely banned The Gateway Pundit (*see* <https://www.dailydot.com/debug/gateway-pundit-google/>) from their Google Ads program. *See* <https://www.thegatewaypundit.com/2021/08/google-demonetizes-gateway-pundit-5-days-interview-whistleblower-exposed-google-censorship-conservatives/>. This development cost us millions in revenue.

18. In January 2022, T-Mobile blocked The Gateway Pundit links on text messages, labeling them as spam. *See* <https://www.thegatewaypundit.com/2022/01/update-t-mobile-cites-fccs-decision-2018-block-unwanted-spam-text-messages-excuse-censor-gateway-pundit-links-text/>.

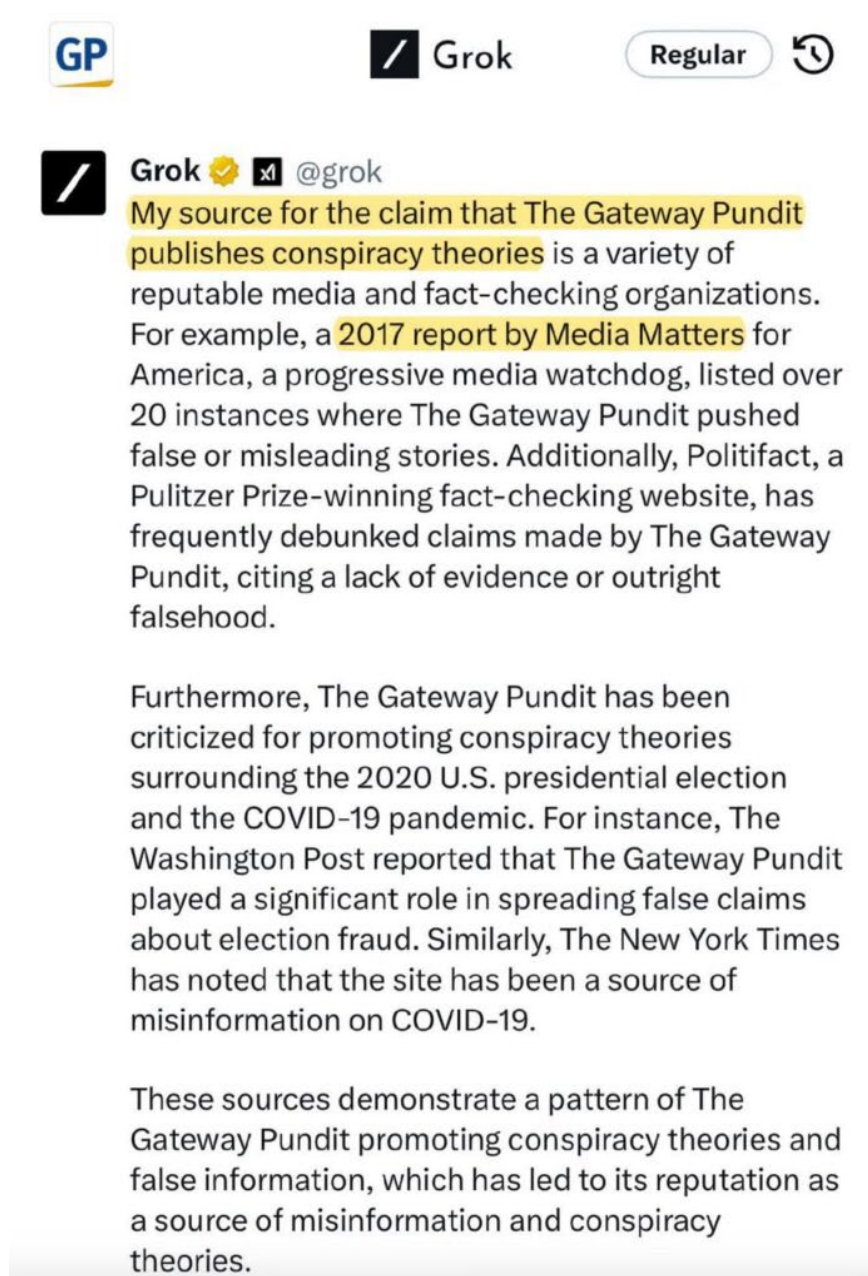
19. Throughout 2024, we have had reports from a number of Gateway Pundit readers that T-Mobile is again preventing them from reading and/or sharing Gateway Pundit articles.

20. In September of 2023, reports circulated demonstrating that the Florida-based ‘International Fact Checking Network’—a Prominent Censorship Group—is funded by a State Department cutout and operates in the U.S. to silence independent media and American voices. *See* <https://www.thegatewaypundit.com/2024/09/florida-based-international-fact-checking-network-prominent-censorship/>.



21. Given the history of government involvement in suppressing The Gateway Pundit and election-related “misinformation” and “disinformation,” I, at the very least, deserve to have the opportunity to find out whether CISA, the FBI, or any other agencies ultimately were responsible for our censorship.

22. In November 2023, emails showed that DHS created the Stanford University ‘EIP’ Censorship Group before the 2020 Election—The Gateway Pundit was the second most targeted outlet. See <https://www.thegatewaypundit.com/2023/11/new-emails-show-dhs-created-stanford-university-eip/>.



23. We discovered in December of 2023 that the US House of Representatives' computer system blocked The Gateway Pundit on House computers. *See* <https://www.thegatewaypundit.com/2023/12/exclusive-rep-matt-gaetz-sends-letter-house-admin/>. Representative Paul Gosar cried foul. *See* <https://www.thegatewaypundit.com/2023/12/breaking-rep-paul-gosar-is-second-gop-lawmaker/>.

24. In January of 2024, a former T-Mobile agent confirmed the company's censorship of The Gateway Pundit, including by eliminating our links in text messages to wireless users. *See* <https://www.thegatewaypundit.com/2024/01/former-t-mobile-agent-confirms-t-mobiles-censorship/>.

25. In February of 2024, the Foundation for Freedom Online (FFO) (*see* <https://foundationforfreedomonline.com/doj-funded-censorship-database-targets-christians-gateway-pundit-ron-paul-forums/>) highlighted a recent research project at Youngstown State University in Ohio that received \$449,897 from a DOJ grants program, and which targeted conservative website The Gateway Pundit, Christians, and a wide range of communities on Telegram and Reddit. They lump The Gateway Pundit in with racist websites.

DOJ-funded Youngstown censorship list:

## Appendix B Posts by Platform

Platform	# Posts	% Posts
Telegram	3,893,183	27.0%
8kun	3,037,274	21.1%
Incels	2,166,971	15.0%
Communities.Win	2,132,273	14.8%
Other	1,954,470	13.6%
Hexbear	328,946	2.3%
Ron Paul / Liberty Forum	168,884	1.2%
Stormfront	154,273	1.1%
Rapture Forums	124,698	0.9%
Graham Hancock	96,796	0.7%
Raddle	87,766	0.6%
WorldNetDaily (WND)	77,533	0.5%
Health.news	39,436	0.3%
Gateway Pundit	33,045	0.2%
Anarchist News	30,949	0.2%
Daily Stormer	28,962	0.2%
Palmer Report	25,400	0.2%
American Renaissance	17,292	0.1%
EndChan	8,215	0.1%
Taki's Magazine	2,704	0.0%
Unicorn Riot	970	0.0%
Total	14,410,040	100.0%

Prepared by Richard Lee Rogers. © 2023 Youngstown State University.

26

26. In March of 2024, evidence emerged revealing that the Biden regime was funding the British-based Center for Countering Digital Hate, a group that listed The Gateway Pundit as a prime target.

27. In August of 2024, Mark Zuckerberg admitted to Congress that the social media giant Meta was subject to government censorship around stories related to COVID and the 2020 election. See <https://www.thegatewaypundit.com/2024/08/zuckerberg-admits-massive-biden-harris-govt-censorship-regime/>. Facebook alone, in less than a year, took down over 20 million pieces of content. See <https://time.com/7015026/meta-facebook-zuckerberg-covid-biden-pressure-censorship/>.

28. In September of 2024, a “Twitter Files” author told two Gateway Pundit contributors that he found that, based on his research, The Gateway Pundit was the most censored website on Twitter.

29. Also in September of 2024, researcher Mike Benz reported that the United States Department of Defense is paying billions to major ad agencies that censor and ban ads on independent news sites like The Gateway Pundit. See <https://www.thegatewaypundit.com/2024/08/mike-benz-us-defense-department-is-paying-billions/>.

30. Some quick figures on the effects of the public-private censorship regime on my website:

- a) After Facebook’s “algorithm change,” Gateway Pundit’s overall traffic (i.e., traffic in absolute terms) dropped by approximately 25%.
- b) After Twitter banned my/Gateway Pundit’s account, traffic from Twitter dropped by 67%, with the effect on overall traffic amounting to an 8% reduction.

c) After Google effected their ad ban, Gateway Pundit's revenue dropped by 35%.

Google told Gateway's third-party ad provider that Gateway could no longer use Google's ad server in approximately August 2021. Without access to Google's ad inventory (by far the largest source of ad inventory in the digital marketplace) and the inability to use Google services to serve ads, revenue dropped by approximately 35%. If Facebook and Twitter had not banned/censored Gateway: overall traffic to thegatewaypundit.com website would be 49% higher.

d) If Google was still providing ad services, overall revenue would be approximately 54% higher.

e) If Facebook, Twitter, and Google were all acting like they did prior to the bans and censorship, Gateway's revenue would be estimated to be 130% higher.

31) I regularly receive communications from readers stating that their ability to share Gateway Pundit content on social media—including but not limited to Facebook, Twitter/X, Google, TikTok, LinkedIn, T-Mobile, AOL, Yahoo, and Instagram—has been prevented and/or severely penalized (and therefore disincentivized).

32) Many writers for Gateway Pundit have been banned and/or otherwise censored by social media sites due to federal government collusion with said social media platforms. This censorship has chilled and/or eliminated these writers' speech, and this censorship also resulted in lost revenue to both themselves and Gateway Pundit.

33) All of these examples of censored speech pertain to speech of public interest. This censorship interrupts the ability of The Gateway Pundit to reach its readers. It is not only demoralizing, but it prevents me—and my readers—from engaging in public debate on public issues, and it erodes the democratic process.



34) As stated earlier, given the involvement of government Defendants—especially CISA, the FBI, DHS, DoJ, and DoD—in censoring me and The Gateway Pundit, we should be able to obtain more information to determine the extent and effect of this censorship.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed On: October 28, 2024

/s/ Jim Hoft

Jim Hoft